## **JOCKET SECTION**

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## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: DAVID R. FRONK (USPS-T-32)
(October 6, 1997)

Pursuant to the Presiding Officer's Ruling No. R97-1/4, the Office of the Consumer Advocate hereby designates the following responses of USPS witness Fronk as the written cross-examination of the OCA, to be included in the record of this proceeding.

- 1. OCA interrogatories T32-1.a., 19, 22-26, 31, 33-35, 36.a.-c., 37, 41, 42, 44, 48, 49, 58, 62, 64.e. and g., 66, 67, 69.b., 71-73, 74.c. and d., 79, 82, 85.b., 89.a., 90-97, 98.b., 99, 100, 102.a., 104, 105, 106.a. and b., 107, 108, 116-118, 125.b., 127-129, and 131-136.
- 2. DFC interrogatories T32-1, 2, 4-7, and 8.b.-h.
- 3. ABA interrogatories T32-2, 3 (as revised 9/12/97), and 4; also, witness Fronk's response to interrogatories redirected from witness Hatfield, i.e., ABA/USPS-T25-2-5.
- 4. ABA&EEI&NAPM interrogatories T32-1-3, 5.b., 6, 7.b., and 9-11.
- 5. MMA interrogatories T32-3-10, 13-15.a., 16, 18-23, 24.a., and 26.
- 6. MPA interrogatories T32-1, 2, and 4
- 7. NAA interrogatories T32-1-20.
- NAPM interrogatories T32-1-6.

- 9. NDMS interrogatories T32-1 (as revised 9/9/97), 2.a.-d., 3-7. 12, 13 (as revised 9/9/97), 14, 22, 25, 33.a., 35, 36, 41 and 42.
- 10. Witness Fronk's response to POIR No. 1, question 9.
- 11. Witness Fronk's response to POIR No. 3, questions 22-24.

Respectfully submitted,

Shelley J. Dreefuss Shelley S. Dreifuss

Attorney

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Shelley A. Dreufuss Shelley S. Dreifuss

Attorney

Washington, D.C. 20268-0001 October 6, 1997